

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**DECLARATION OF JUSTIN LAPATINE IN SUPPORT OF THE  
MOTION OF THE OFFICIAL COMMITTEE OF  
RETIRED EMPLOYEES OF THE COMMONWEALTH  
OF PUERTO RICO TO EXTEND THE VOTING DEADLINE FOR  
HOLDERS OF CLAIMS IN CLASSES 51B, 51D, 51E, 51F, AND 51L**

I, Justin Lapatine, hereby declare as follows under 28 U.S.C. § 1746:

1. I have personal knowledge of and am competent to testify as to the matters set forth herein.

2. I submit this Declaration in support of the *Motion of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico to Extend the Voting Deadline for Holders of Claims in Classes 51B, 51D, 51E, 51F, and 51L* [Dkt. 18214] (the “**Motion**”), filed earlier today, which seeks a fourteen-day extension of the deadline to return ballots for retirees

---

<sup>1</sup> The Debtors in these jointly-administered PROMESA title III cases (these “Title III Cases”), along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

eligible to vote on the *Seventh Amended Title III Joint Plan of Adjustment for the Commonwealth of Puerto Rico et al.* [Dkt. 17629] (the “**Plan**”).

3. I am a partner at Global Strategy Group (“**GSG**”), a full-service research, public affairs, and communications agency. I have developed and managed communications campaigns for almost 20 years.

4. Since 2019, I, along with a team of professionals from GSG working under my supervision, have worked with the Retiree Committee’s professionals to disseminate information to retirees about Puerto Rico’s Title III cases and the Retiree Committee’s June 7, 2019 plan support agreement. In the past few months, GSG’s work has focused on educating retirees about, and assisting retirees with, the Plan balloting and confirmation process.

5. On or about September 10, 2021, GSG coordinated with a local public relations firm, Marchand ICS Group, to conduct an informal email survey of retirees in which approximately 85% of 1,000 respondents indicated that they had not received solicitation packages or ballots, as referenced in paragraphs 2 and 8 of the Motion.

6. On or about September 21, 2021, LinkActiv, a Puerto Rico-based call-center firm working at my direction, reported that approximately 80% of retirees who called had not received solicitation packages or ballots, as referenced in paragraph 8 of the Motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York  
September 23, 2021

/s/ Justin Lapatine  
Justin Lapatine